



Office of Environment, Safety and Health

FERNALD SITE

Program Review/Enforcement Action (2005-05)

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BACKGROUND

- **Fernald traditionally viewed as having strong PAAA/ nuclear Safety program**
 - Consistent and conservative reporting
 - Effective quality problem ID/resolution
- **Typically referred to as “good example” PAAA Program**

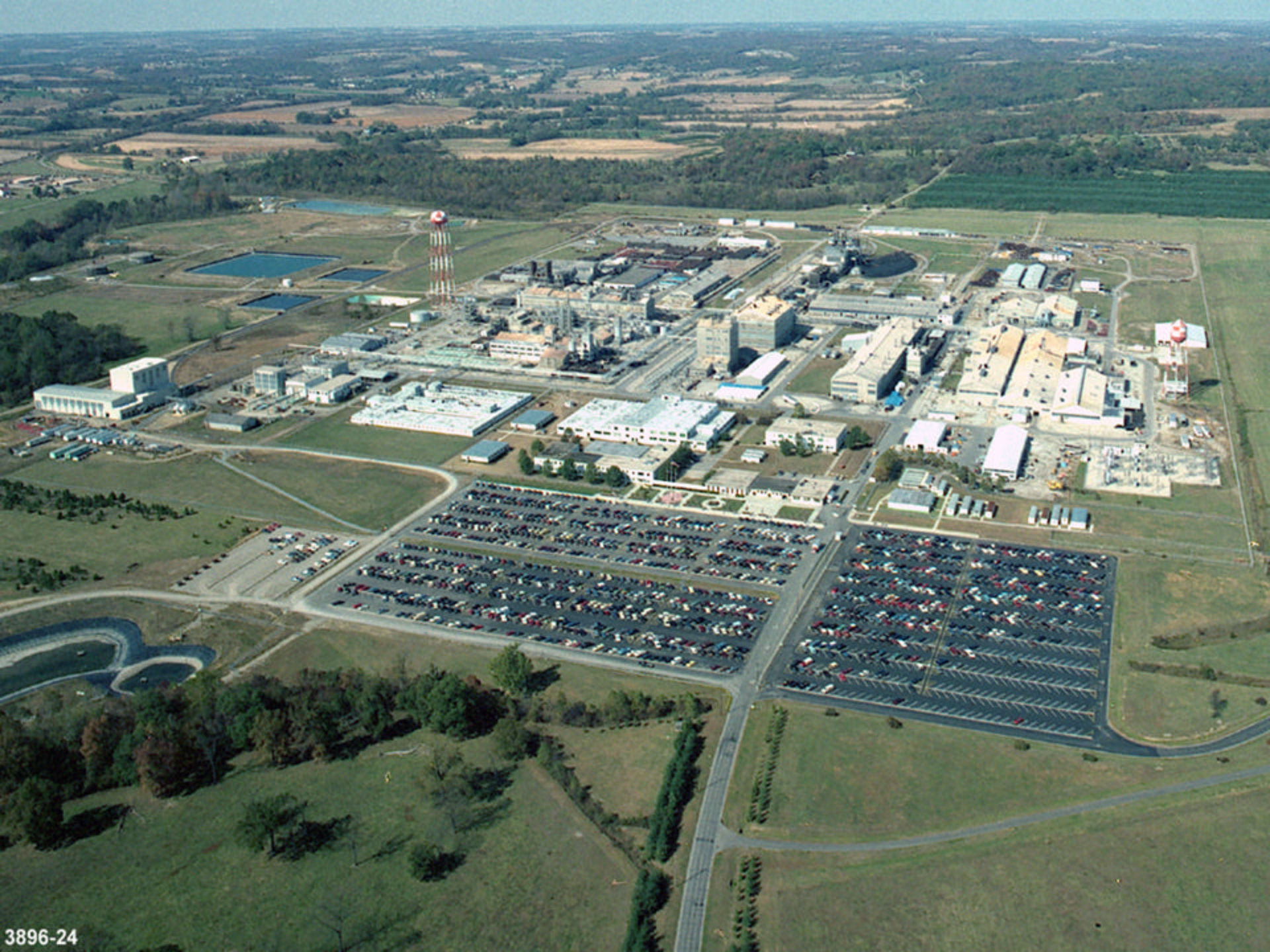
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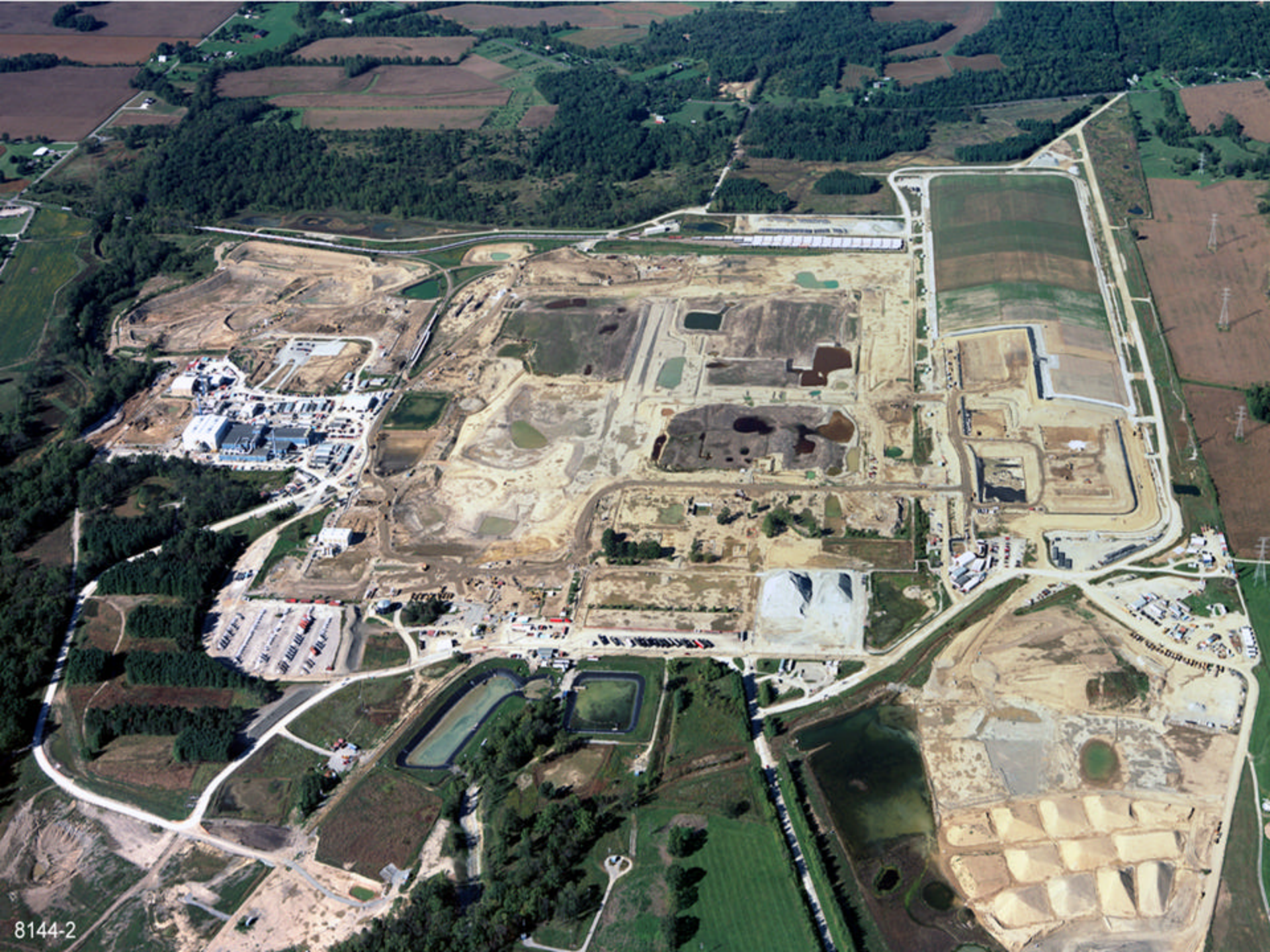


RECENT CONCERNS

- **Schedule – Fernald aggressively pursuing higher-risk closure activities**
- **Sudden decline in NTS reporting (0 reports for 8 months)**
- **Increase in radiological events**
- **Significant decline in RDR numbers until prompted by DOE**

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DILEMMA

- **How best to respond to FCP/EH-6 concerns**
- **No significant event for follow-up**
- **Options:**
 - **Severity Level III violations on more minor events**
 - **Program Review**
- **Decision – Program Review**

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PROGRAM REVIEW OUTCOME

- **Lack of reporting of significant issues**
- **“Lumping” all issues as Work Process violations**
- **Multiple deficiencies in RWP compliance - varying significance**
- **Multiple deficiencies in material control**

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PROGRAM REVIEW

OUTCOME (cont'd)

- **RWP, material issues not recognized by contractor**
- **10 CFR 835 audits not finding issues**
- **QA audits – major decline in significant findings**

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ENFORCEMENT

- **Decision to take enforcement based on lack of recognition, corrective actions for concerns**
- **Three citations:**
 - **Radiological procedure compliance (RWP)**
 - **10 CFR 835 Internal Audits**
 - **Quality Improvement**
- **Cited as SLIII, total \$33K penalty**

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FOLLOW UP

- **Site pace of activities warrants continuing follow-up**
- **PNOV required 90 day follow-up meeting**
- **Regular conference calls – another follow-up briefing planned**

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